

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

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: PROMESA
: Title III
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: Case No. 17-BK-3283 (LTS)
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: Jointly Administered
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X

**INFORMATIVE MOTION REGARDING CHANGE OF FIRM AND ADDRESS, AND
PROPOSED SUBSTITUTION OF COUNSEL**

To the Honorable United States District Judge Laura Taylor Swain:

Continental PLLC (collectively, “Continental”) and its attorneys John Arrastia, Jesus Suarez, and Angelo Castaldi, the proposed substitute special litigation counsel for the Official Committee of Unsecured Creditors (the “Committee”),² file this informative motion to provide notice of the change of their firm and address in conjunction with their proposed substitution as special litigation counsel:

The Debtors in these Title III cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² The Committee is the official committee of unsecured creditors for all Title III Debtors, other than PBA and COFINA.

1. This informative motion is filed contemporaneously with the *Application for Order Pursuant to Bankruptcy Code Section 1103(a) And Local Bankruptcy Rule 2014-1(E) Authorizing Employment and Retention of Continental PLLC as Substitute Special Litigation Counsel to Official Committee of Unsecured Creditors, Effective as of February 14, 2022* (“Application”) (Dkt. No. 20222). The Application respectfully requests an Order authorizing the retention and employment of Continental and its attorneys as substitute special litigation counsel for the Committee, effective as of February 14, 2022.

2. Attorneys John Arrastia, Jesus Suarez, and Angelo Castaldi (the “Attorneys”) have each appeared as counsel on behalf of the Committee following the Committee’s retention (*See* Dkt. Nos. 6681, 7181) of their prior law firm as special litigation counsel.

3. As more fully set forth in the Application, the Attorneys have recently joined Continental. Continental is a law firm with offices in Florida and Washington D.C., with a specialized practice in commercial litigation and bankruptcy litigation.

4. Notwithstanding this change, and subject to this Court’s approval of the Application, the Attorneys will continue to represent Committee in the above-captioned matter. Subject to the Court’s approval of the Application, Continental and the Attorneys have substituted for the prior law firm, Genovese Joblove & Battista P.A., as counsel to the Special Litigation Counsel and Conflicts Counsel to the Committee.

5. Continental and the Attorneys give notice of their new address and contact information, as follows:

John Arrastia
Jesus Suarez
Angelo Castaldi
CONTINENTAL PLLC

255 Alhambra Cir., Suite 640
Coral Gables, FL 33134
Tel: 305-677-2707

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JSuarez@continentalpllc.com
ACastaldi@continentalpllc.com

BASED ON THE FOREGOING, Continental and the Attorneys respectfully request that the Court and all parties in interest take notice of the foregoing.

RESPECTFULLY SUBMITTED.

I HEREBY CERTIFY, that on this same date, a true copy of the foregoing was filed through the Court's CM/ECF system, which will generate a notice to all CM/ECF participants in this case.

Dated, this 28th day of February 2022.

/s/ John Arrastia

John Arrastia, Esq. (*Pro Hac Vice*)

Jesus M. Suarez, Esq. (*Pro Hac Vice*)

Angelo M. Castaldi, Esq. (*Pro Hac Vice*)

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*Proposed Special Litigation Counsel to the Official
Committee of Unsecured Creditors*